

**BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

**In the Matter of the Accusation  
Against:**

**ARNOLD E. ZEFF, M.D.**

**Case No. 800-2017-029902**

**Physician's and Surgeon's  
Certificate No. C 28006**

**Respondent**

**DECISION AND ORDER**

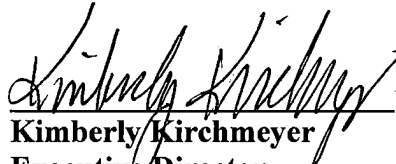
**The attached Stipulation for Surrender of Certificate is hereby  
adopted as the Decision and Order of the Medical Board of California,  
Department of Consumer Affairs, State of California.**

**This Decision shall become effective at 5:00 p.m. on August 18, 2017.**

**IT IS SO ORDERED August 11, 2017.**

**MEDICAL BOARD OF CALIFORNIA**

**By:**

  
**Kimberly Kirchmeyer  
Executive Director**

1 XAVIER BECERRA  
Attorney General of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 LAWRENCE MERCER  
Deputy Attorney General  
4 State Bar No. 111898  
455 Golden Gate Avenue, Suite 11000  
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*Attorneys for Complainant*  
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8 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

11 **ARNOLD E. ZEFF, M.D.**  
201 Spur Ridge Lane  
12 Healdsburg, CA 95448-8094

13 Physician's and Surgeon's Certificate No. C28006,

14 Respondent.  
15  
16

Case No. 800-2017-029902

**STIPULATION FOR SURRENDER OF  
CERTIFICATE**

17  
18 In the interest of a prompt and speedy resolution of this matter, consistent with the public  
19 interest and the responsibility of the Medical Board of California, Department of Consumer  
20 Affairs, (hereinafter, the "Board"), the parties hereby agree to the following Stipulation for  
21 Surrender of Certificate which will be submitted to the Board for its approval and adoption as the  
22 final disposition of Case No. 800-2017-029902.

23  
24 1. Kimberly Kirchmeyer ("Complainant") is the Executive Director of the Medical  
25 Board of California, Department of Consumer Affairs, who brought this action solely in her  
26 official capacity. She is represented in this matter by Xavier Becerra, Attorney General of the  
27 State of California, by Lawrence Mercer, Deputy Attorney General.  
28

1           2.     Respondent Arnold E. Zeff, M.D. ("Respondent"), is represented in this matter by his  
2 attorney Michelle D. Neumann, 3558 Round Barn Blvd., Suite 200, Santa Rosa, CA 95403.

3           3.     On or about February 28, 1966, the Medical Board issued Physician's and Surgeon's  
4 Certificate Number C28006 to Arnold E. Zeff, M.D. At all relevant times, said certificate was  
5 current and valid and, unless renewed, will expire on May 31, 2018.

6                                   **JURISDICTION**

7           4.     Accusation No. 800-2017-029902 ("Accusation") was filed before the board and is  
8 currently pending against Respondent. The Accusation, together with all other statutorily  
9 required documents, was duly served on Respondent at his address of record. A copy of  
10 Accusation No. 800-2017-029902 is attached as Exhibit A and incorporated herein by reference.

11                                   **ADVISEMENT AND WAIVERS**

12           5.     Respondent has carefully read and understands the charges and allegations in  
13 Accusation No. 800-2017-029902. Respondent has also carefully read and understands the  
14 effects of this Stipulation for Surrender of Certificate.

15           6.     Respondent is fully aware of his legal rights in this matter, including the right to a  
16 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at  
17 his own expense; the right to confront and cross-examine the witnesses against him; the right to  
18 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel  
19 the attendance of witnesses and the production of documents; the right to reconsideration and  
20 court review of an adverse decision; and all other rights accorded by the California  
21 Administrative Procedure Act and other applicable laws.

22           7.     Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
23 every right set forth above.

24                                   **ACKNOWLEDGMENTS**

25           8.     Respondent understands and agrees that the charges and allegations in Accusation  
26 No. 800-2017-029902, if proven at a hearing, constitute cause for imposing discipline upon his  
27 Physician's and Surgeon's Certificate. Respondent hereby gives up his right to contest these  
28

1 charges and he agrees that his Physician's and Surgeon's Certificate is subject to discipline  
2 pursuant to section 822 of the Business and Professions Code.

3 9. Respondent desires and agrees to surrender his Physician's and Surgeon's Certificate  
4 for the Board's formal acceptance, thereby giving up his right to practice medicine in the State of  
5 California.

6 **RESERVATION**

7 10. The admissions made by Respondent herein are only for the purposes of this  
8 proceeding or any other proceedings in which the Medical Board of California or other  
9 professional licensing agency in any state is involved, and shall not be admissible in any other  
10 criminal or civil proceedings.

11 **CONTINGENCY**

12 11. This Stipulation shall be subject to the approval of the Board. Respondent  
13 understands and agrees that Board staff and counsel for Complainant may communicate directly  
14 with the Board regarding this Stipulation, without notice to or participation by Respondent or his  
15 attorney. If the Board fails to adopt this Stipulation as its Order in this matter, the Stipulation  
16 shall be of no force or effect; it shall be inadmissible in any legal action between the parties; and  
17 the Board shall not be disqualified from further action in this matter by virtue of its consideration  
18 of this Stipulation.

19 12. The parties understand and agree that facsimile and electronic format copies of this  
20 Stipulation for Surrender of Certificate, including facsimile and electronic format signatures  
21 thereto, shall have the same force and effect as the originals.

22 **STIPULATION AND ORDER**

23 **IT IS THEREFORE STIPULATED AND ORDERED** as follows:

24 1. **SURRENDER** Respondent hereby agrees that he will surrender his wall and wallet  
25 Physician's and Surgeon's Certificates and all other indicia of his right to practice medicine in the  
26 State of California to the Board or its representative on or before the effective date of this  
27 decision, and the Board agrees to accept this surrender in resolution of this matter.  
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1           2.     **REINSTATEMENT** Respondent fully understands and agrees that if he ever files  
2 an application for re-licensure or reinstatement in the State of California, the Board shall treat it  
3 as a petition for reinstatement. Respondent must comply with all the laws, regulations and  
4 procedures for reinstatement of a revoked license in effect at the time any petition is filed,  
5 including but not limited to Business and Professions Code section 823, and he understands and  
6 agrees that all of the allegations and causes for discipline contained in Accusation No. 800-2017-  
7 029902 will be deemed to be true, correct and admitted by him for purposes of the Board's  
8 determination whether to grant or deny the petition. Respondent agrees that he will not petition  
9 for reinstatement for at least one (1) year following the effective date of this decision.  
10 Respondent hereby waives any time-based defense he might otherwise have to the charges  
11 contained in Accusation No. 800-2017-029902 including, but not limited to, the equitable defense  
12 of laches.

13           3.     Respondent understands that by signing this Stipulation, he is enabling the Board to  
14 issue its order accepting the surrender of his license without further process. He further  
15 understands that upon acceptance of this Stipulation by the Board, he will no longer be permitted  
16 to practice as a physician and surgeon in California.

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1 ACCEPTANCE

2 I, ARNOLD E. ZEFF, M.D., have carefully read the above Stipulation for Surrender of  
3 Certificate and fully discussed it with my attorney. I enter into it freely and voluntarily and with  
4 full knowledge of its force and effect, do hereby agree to surrender my Physician's and Surgeon's  
5 Certificate no. C28006 to the Medical Board of California for its formal acceptance. By signing  
6 this Stipulation to surrender my license, I recognize that as of the effective date of this Decision, I  
7 will lose all rights and privileges to practice as a physician and surgeon in the State of California  
8 and, if I have not already done so, I also will cause to be delivered to the Board both my license  
9 and wallet certificates on or before the effective date of the decision.

10 Dated: 8/8/17

11 Arnold E. Zeff, M.D.  
12 ARNOLD E. ZEFF  
13 Respondent

14 I have read and fully discussed with Respondent ARNOLD E. ZEFF, M.D. the terms and  
15 conditions and other matters contained in the Stipulation for Surrender of Certificate. I approve  
16 its form and content.

17 Dated: 8/8/17

18 [Signature]  
19 MICHELLE D. NEUMANN  
20 Attorney for Respondent  
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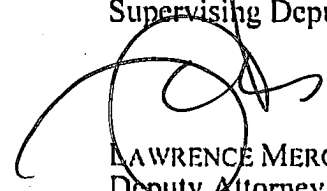
**ENDORSEMENT**

The foregoing Stipulation for Surrender of Certificate is respectfully submitted for consideration by the Medical Board of California, Department of Consumer Affairs.

Respectfully submitted,

Dated: *August 8, 2017*

XAVIER BECERRA  
Attorney General of California  
JANE ZACK SIMON  
Supervising Deputy Attorney General



LAWRENCE MERCER  
Deputy Attorney General  
*Attorneys for Complainant*

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## **EXHIBIT A**



1 XAVIER BECERRA  
Attorney General of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 LAWRENCE MERCER  
Deputy Attorney General  
4 State Bar No. 111898  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-5539  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*

8 BEFORE THE  
9 MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 800-2017-029902

11 **ARNOLD E. ZEFF, M.D.**  
12 201 Spur Ridge Lane  
13 Healdsburg, CA 95448 – 8094

**ACCUSATION**

14 Physician's and Surgeon's Certificate No. C28006,

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official  
20 capacity as the Executive Director of the Medical Board of California.

21 2. On or about February 28, 1966, the Medical Board issued Physician's and Surgeon's  
22 Certificate Number C28006 to ARNOLD E. ZEFF, M.D. (Respondent). At all relevant times,  
23 said certificate was current and valid and, unless renewed, will expire on May 31, 2018.

24 **JURISDICTION**

25 3. This Accusation is brought before the Medical Board of California, under the  
26 authority of the following laws. All section references are to the Business and Professions Code  
27 unless otherwise indicated.

28 //

1  
2 4. This Accusation is brought before the Medical Board of California, under the  
3 authority of the following laws. All references are to the Business and Professions Code unless  
4 otherwise specified.

5 5. Section 2227 of the Business and Professions Code provides that a licensee who is  
6 found guilty under the Medical Practice Act may have his or her license revoked, suspended for a  
7 period not to exceed one year, placed on probation and required to pay the costs of probation  
8 monitoring, or such other action taken in relation to discipline as the Division deems proper.

9 6. Section 2234 of the Code provides in relevant part that the Board "shall take action  
10 against any licensee who is charged with unprofessional conduct."

11 7. Section 822 of the Code provides that if the Board determines that a licensee's ability  
12 to practice his profession safely is impaired because the licensee is mentally ill, or physically ill  
13 affecting competency, the licensing agency may take action by revoking or suspending the  
14 license, placing the licensee on probation, or taking such other action as the licensing agency in  
15 its discretion deems proper.

#### 16 CAUSE FOR DISCIPLINARY ACTION

17 8. Respondent ARNOLD E. ZEFF, M.D. is subject to disciplinary action under section  
18 2234 and 822 of the Code, in that Respondent suffers from a mental illness, or physical illness  
19 affecting competency. The circumstances are as follows:

20 A. On January 27, 2017, the Board received an 805 Report, which is a health  
21 facility/peer review reporting form required by law, from the Medical Staff at Healdsburg District  
22 Hospital. The hospital reported that Respondent's staff privileges had been summarily  
23 suspended.

24 B. The hospital produced its records in response to a request from the Board. From  
25 these documents, it was learned that Respondent's privileges were suspended and his  
26 reapplication was denied based upon a patient complaint that Respondent appeared to have  
27 difficulty remembering who the patient was and what they had discussed.  
28

1 C. On February 20, 2017, Respondent underwent a neuropsychological evaluation to  
2 assess his current cognitive functioning and to objectively determine if Respondent was unable to  
3 safely or effectively perform his defined duties.

4 D. In a subsequent report, the neuropsychological evaluator reported that Respondent  
5 demonstrated a decline in his overall cognitive functioning.

6 E. On May 9, 2017, the neuropsychological evaluator was interviewed by an  
7 investigator and a medical consultant for the Board. The evaluator confirmed the findings in his  
8 report and advised that Respondent is unable to practice medicine with safety to the public at this  
9 time.

10 **PRAYER**

11 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
12 and that following the hearing, the Board issue a decision:

13 1. Revoking or suspending Physician's and Surgeon's Certificate Number C28006,  
14 issued to ARNOLD E. ZEFF, M.D.;

15 2. Revoking, suspending or denying approval of ARNOLD E. ZEFF, M.D.'s authority to  
16 supervise physician assistants and advanced nurses, pursuant to section 3527 of the Code;

17 3. Ordering ARNOLD E. ZEFF, M.D., if placed on probation, to pay the Board the costs  
18 of probation monitoring; and

19 4. Taking such other and further action as deemed necessary and proper.

20  
21 DATED: May 10, 2017

for   
22 KIMBERLY KIRCHMEYER  
23 Executive Director  
24 Medical Board of California  
State of California  
Complainant

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